



MARYLAND DEPARTMENT OF THE ENVIRONMENT

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Frequently asked questions from licensed Asbestos Contractors

Notifications

1. Can I send in a notification for a project I'm bidding on? I'd like to beat out the competition.

No. Do not send in notifications for projects you have not won.

2. Why does MDE call me about notifications I've sent in and ask questions?

- The notifications might not have been filled in correctly or completely
- The writing may not be legible and look like chicken scratch
- The dates may need to be changed for the 10 working day notifications
- Work methods to be used was not filled out

3. I sent my notification in 10 days prior to starting. Why can't I start on May 25th when I sent the notification in on May 15th? What do you mean by working days?

Notifications need to be hand delivered or postmarked 10 working days prior to the start of the project. Working days are Monday thru Friday and do not include weekends.

Notification Requirements for Asbestos Demolition and Renovation Projects

Notifications must be postmarked or hand delivered at least 10 working days before the start of the asbestos removal or demolition. Do not count from the day you sign the notification unless it will be delivered or postmarked the same day. Working days are defined as Monday through Friday, including holidays. We count ten days including the day of postmark, with work starting on day 11. The easiest way to calculate this is to look at a monthly calendar, and move straight down two weeks from the day of postmark; that is the first day work may begin.

Sun.	Mon.	Tues.	Wed.	Thurs.	Fri.	Sat.
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

Notice
mailed

First day
work may

4. Do I need to send in a courtesy notification for projects I'm doing in a single family residence?

The notification would not be a "courtesy" because it is a requirement for all projects other than O&M projects. COMAR does apply no matter how much or how little asbestos is involved.



- 5. I'm planning to use a buffer to remove 140 square feet of mastic from 15 furnace rooms at an apartment complex. I'm removing a non-neshap amount from each of the buildings and was told I'd need to notify as NESHAP. Why would I need to notify this project as NESHAP?**

You've reached the NESHAP threshold.

Asbestos Contractor License

2 or less- \$125

3 or more- \$750

- 6. I submitted a licensed application and on it I said that I would only have two or less employees engaged in the asbestos projects. All together I have five people trained to remove/disturb asbestos. Can I list them all on the application as my employees if I'm only paying the amount for two or less employees, because I only plan on doing small jobs using two people?**

No. The two people on the application are the only ones who can be out there. Unless one leaves the business, then another can take their place.

- 7. If I use more people than I paid for on the application will I get a fine?**

Yes

Worker Protection Requirement

- 8. Is it acceptable to wear a hat or bandana instead of wearing the hood of a Tyvek suit up to cover ones head?**

No.

- 9. I'm bald so there is no chance of me getting asbestos in my hair do I need to wear the hood of my Tyvek suit up?**

Yes

- 10. I slide when I wear the Tyvek suit over my work boots, can I wear my Tyvek suit with the feet cut out so my work boots can help me from sliding around while I'm working in an asbestos environment?**

No.

- 11. It gets really hot inside while working in the containments. Can I drink inside the containment so I don't get dehydrated?**

No. There is no smoking, eating or drinking inside an asbestos environment.

Control of Emissions from an Asbestos Project

12. When do I need to post the Project Notification signs?

Three days before removing or encapsulating asbestos for a NESHAP project.

13. We don't have water at our project site. Can we forgo using water?

No.

14. I'm doing a NESHAP project a hospital/school/commercial bldg etc. and they do not want me to post a Project Notification sign outside all entrances to and exits from the work site. Can I forgo the sign because the client doesn't want it posted?

NO. The signs are required to be posted at all entrances to and exits from a work site informing the public in the immediate vicinity that asbestos abatement will be performed.

15. I plan on using glovebags on a NESHAP project. I'm removing 240 Linear feet of pipe insulation, 100 square feet of boiler insulation and 300 square feet of floor tile/mastic using a buffer on the mastic. Do I need a variance for the glovebags?

Yes

16. The building is going to be demolished and it doesn't have electricity or a working heating system. Do I need to cover the vents?

Yes. Before beginning any demolition project, cover all windows, doors, and other openings with plastic sheeting and seal with tape.

17. I'm doing a non-Neshap floor tile removal project in a liquor store. What kind of containment do I need to put up?

You would need to cover criticals like vents and other openings. If there is a chance you will make the tile friable it would be best to set up a full containment.

18. Our shower for the decon leaks at the bottom. Can we just go with a 2 stage decon for a NESHAP project?

No.

Other:

19. We found abandoned asbestos-cement pipe and would like to know if we can crush it and backfill it or pump grout into the buried lines?

The crushing of asbestos-cement pipe, Category II nonfriable ACM, would cause the material to become regulated ACM (RACM) and would be subject to sections 61.145 and 61.150. The backfilling and burial of crushed A/C pipe in place would cause these locations to be considered active disposal sites and subject to section 61.154. If no additional asbestos waste is buried at that location within a year, the site would become an inactive site subject to 61.151(e) and 61.154(h). If the pipe is not crumbled, pulverized, or reduced to powder, it would not be subject to the NESHAP. Pumping grout into the buried lines would not cause the pipe to become RACM.

20. Can I use composite sampling with joint compound?

Yes. You can treat a wallboard system with a composite asbestos content of less than or equal to one percent as non-ACM – providing you can figure out which components can be composited and which cannot.